

*"Progress is our
Maine objective"*

Haverhill Economic Development Commission
200 Summer Street, Haverhill, ME 01011 ☎ (207) 555-1212

July 26, 2004

Dennis Puccinelli, Executive Secretary
Foreign-Trade Zones Board
FCB – Suite 4100W
1401 Constitution Ave., NW
Washington DC 20230

**RE: Foreign-Trade Zone 411, Haverhill, Maine
Application for FTZ Manufacturing Authority
for Ho-Ho Holiday Paper, Inc.**

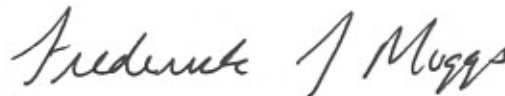
Dear Mr. Puccinelli,

Please find enclosed the application of the Haverhill Economic Development Commission, grantee of FTZ 411, requesting manufacturing authority for Ho-Ho Holiday Paper, Inc. This application is submitted in accordance with 15 CFR, Part 400.31.

The Haverhill Economic Development Commission's Board has authorized the submission of this FTZ manufacturing application. Ho-Ho Holiday Paper, Inc. has provided information in the application form about its background and operation, as well as their ability to operate under the requirements of both the Foreign-Trade Zones Board and U.S. Customs and Border Protection.

We appreciate your consideration of this application. If you have any questions, please do not hesitate to contact us at (207) 555-1212.

Sincerely,



Frederick J. Muggs
Chairman
Haverhill Economic Development Commission



The Foreign-Trade Zones Board

Application for FTZ Manufacturing Authority

In addition to the basic information to provide on this page, the form for FTZ manufacturing authority has four possible sections to complete¹. Most companies do **not** need to complete all four sections – after reading the guidance below, complete **only** the sections that apply to your situation. Our web site – <http://www.trade.gov/ftz> – explains the different types of manufacturing authority.

➤ WHICH SECTIONS TO COMPLETE?

For all applications:

Section A All applicants must complete Section A (company/industry information).

All applications will also use at least one of the three additional sections (Sections B, C, and D). Those sections are used to list the "scope" (*i.e.*, products to be manufactured and foreign components to be used) for the different types of manufacturing applications:

Section B Only used if you are requesting temporary/interim authority;

Section C Only used to define the **primary** scope if requesting permanent authority; and

Section D Only used to define an optional **secondary** scope (for permanent authority).

Only fill out the sections that are relevant to the authority you are seeking, answering the questions completely using the boxes provided. There is a continuation page at the end of Section A, if needed.

➤ TRANSMITTAL LETTER

1. Is your application form accompanied by the required "letter of transmittal" (currently dated and signed by an authorized officer of the FTZ grantee or operator)? Yes ____ No ____

➤ SITE INFORMATION/COMPANY NAME

2. a. Zone/Subzone #: b. Site Number(s):
3. Site Address(es):

4. Company (Manufacturer) Name:

¹ Note: If you wish to apply for export-only manufacturing authority, there is a simpler "Application for Export-Only Manufacturing Authority" form for you to use.

SECTION A (PRODUCT, COMPANY, & INDUSTRY INFORMATION)

For each section, please answer all questions completely within the appropriate box provided. (There is a continuation page provided at the end of this section, if needed.) Submission of incomplete or inaccurate information may delay the processing of your application.

➤ TYPE OF AUTHORITY BEING REQUESTED

- A1. At this time, are you submitting a request for temporary/interim manufacturing authority?
Yes ___ No ___ (If yes, also complete and submit Section B).
- A2. At this time, are you submitting a request for permanent authority for manufacturing?
Yes ___ No ___ (If yes, also complete and submit Section C [and Section D, if applicable]).

➤ CUSTOMS & BORDER PROTECTION AUTOMATED SYSTEMS

- A3. Do you commit to work with Customs & Border Protection, as appropriate, to meet future CBP requirements for automated systems? Yes ___ No ___

➤ QUESTIONS ON YOUR REQUESTED SCOPE IN SECTIONS "B" AND/OR "C"

- A4. Are any of the inputs subject to antidumping ("AD") or countervailing duty ("CVD") duties? Are any of the inputs subject to quantitative restrictions (quotas)? Are you aware of any other trade-related issues affecting any of the inputs? If yes to any of these questions, explain:

➤ FTZ-RELATED SAVINGS:

- A5. a. What are your total estimated annual FTZ-related savings:
- b. Provide the percentage breakdown for those savings into the following categories:

Logistical/Paperwork ¹	_____ %
Inverted Tariff	_____ %
Exports	_____ %
Duty Deferral	_____ %
Scrap/Waste	_____ %

¹ e.g., Merchandise Processing Fee, broker/handling fees, weekly entry

- c. Provide any additional explanation or special features of the above savings that may be relevant to the review or implementation of zone procedures (*e.g.*, formulas, Customs rulings, scrap as percentage of imported product).

A6. In evaluating the viability of your proposal, have you considered the costs associated with a subzone (*e.g.*, record keeping/inventory control, fees to the zone grantee)? Yes ____ No ____

➤ **COMPANY, SOURCING, MARKET, AND INDUSTRY INFORMATION:**

Answer these questions completely based on the information available to you. (You may rely on your expert knowledge of the industry in addition to traditional, published resources.)

A7. Briefly describe your company's history and current situation (including annual sales value or other indicator(s) of company's size and scope of operations):

A8. Briefly describe the manufacturing activity which you are seeking to conduct (temporarily and/or permanently) under FTZ procedures:

A9. Please list the main internet address(es) for information about your company and product(s):

A10. Indicate current annual production capacity at the facility(ies) for which you are seeking FTZ manufacturing authority (specify units of measure):

A11. Indicate the percent of U.S. value added² for the products you propose to produce under FTZ procedures: _____ % (approximate).

A12. By value, what percent of your production inputs are imported? _____ % (approximate)

A13. Are the inputs that you purchase from abroad also available from U.S. suppliers (if yes, why are you unable to obtain those inputs domestically)? Will FTZ -related savings affect the company's purchasing patterns? Explain.

A14. Does your company have other plants (in the U.S. or overseas) that produce the same products? If yes, please list their locations.

A15. a. List total employment company-wide: _____ employees (approximate)

b. and total employment at the plant: _____ employees (approximate).

A16. How has your company's employment changed in the last 5 years? Will FTZ-related savings likely lead to increased, stable, or decreased employment at your site? Explain.

A17. What is your company's current share of the U.S. market for the products that you seek to produce under FTZ procedures? _____ % (approximate).

² *i.e.*, the difference between the value of foreign components received at the subzone and the value of finished products shipped from the subzone.

A18. a. Imports account for _____ % (approximate) of the U.S. market for the products you seek to manufacture under FTZ procedures.

b. Has imports' share of the U.S. market changed in the past 5-10 years? How? Why?

A19. a. What percent of your proposed FTZ-related production is sold to export markets? _____ % (approximate).

b. Do you know your share of the world-wide market for the products that you seek to produce under FTZ procedures? If yes, list it here: _____ % (approximate).

A20. a. List your major competitors in the U.S. market and their approximate market shares:

b. List your major competitors in the world market:

A21. Are your competitors producing in the U.S. or abroad? Explain and give specific examples:

A22. How would approval of your proposed manufacturing under FTZ procedures affect your domestic competitors? Are the purchasing patterns of competing domestic manufacturers similar to your company's? If you are granted authority to manufacture under FTZ procedures, would the other U.S. manufacturers be likely to seek access to zone procedures? Explain.

A23. What are the competitive factors in your industry? Any other factors unique to your industry?

A24. Describe problems, challenges or strengths facing your company and the U.S. industry. Have production, employment, and operating profits been falling or rising? Have there been changes in the cost of raw materials? (Also address any other relevant factors.)

A25. Why would approval of FTZ manufacturing authority in this case be in the public interest? (*e.g.*, Would FTZ savings help to offset customs/duty advantages that foreign plants enjoy? Help your company compete with foreign-manufactured products in the U.S. market? Help your company to maintain U.S. operations? Would approval of FTZ authority make a positive contribution to the U.S. economy, employment at your company or its suppliers?) Explain.

A26. Are you aware of any studies or reports that have been done recently regarding your industry or industry sector? If yes, please list the titles and authors/publishers below – you do not need to submit the studies/reports with the application. Note: The FTZ Staff may later ask for your assistance in obtaining a copy of these publications as part of the Staff's case-related research.

CONTINUATION PAGE: You may use this page to continue any answer(s) for which you did not have adequate space in the box(es) provided above. Please precede any continued answer with the number of the question to which it pertains.

CLICK HERE TO ADD ANOTHER CONTINUATION PAGE

NOTE: Because the applicant is not seeking Temporary/Interim Manufacturing Authority, Section B is not being submitted.

SECTION C (PRIMARY SCOPE FOR PERMANENT AUTHORITY)

The information in this section will establish the "primary" scope of authority if you wish to conduct activity under permanent FTZ authority. Your primary scope should only include: 1) the range of finished products and foreign-status inputs that your company plans to use in manufacturing under FTZ procedures and 2) finished products and foreign-sourced inputs that you believe that there is a significant likelihood that your company will need to use for FTZ manufacturing.

➤ SIMULTANEOUS TEMPORARY/INTERIM AND PERMANENT APPLICATIONS

- C1. a. Are you simultaneously submitting a request for temporary/interim authority (with a scope listed in Section "B")? Yes ____ No ____
- b. If you checked "Yes," do you wish to include the products and inputs for which you are requesting temporary/interim authority in your application for permanent authority? Yes ____ No ____ (If you checked yes, you do not need to list those products and inputs again in this section. You only need to list below the additional products and inputs for which you are seeking permanent authority.)

➤ FINISHED PRODUCTS – List the products for which you are requesting permanent manufacturing authority.

Product Description	HTSUS (6 Digit)	Duty rate
AA.		
AB.		
AC.		
AD.		
AE.		
AF.		
AG.		
AH.		
AI.		
AJ.		
AK.		
AL.		
AM.		
AN.		
AO.		
AP.		
AQ.		

AR.

AS.

AT.

AW.

AX.

AY.

AZ.

BA.

BB.

BC.

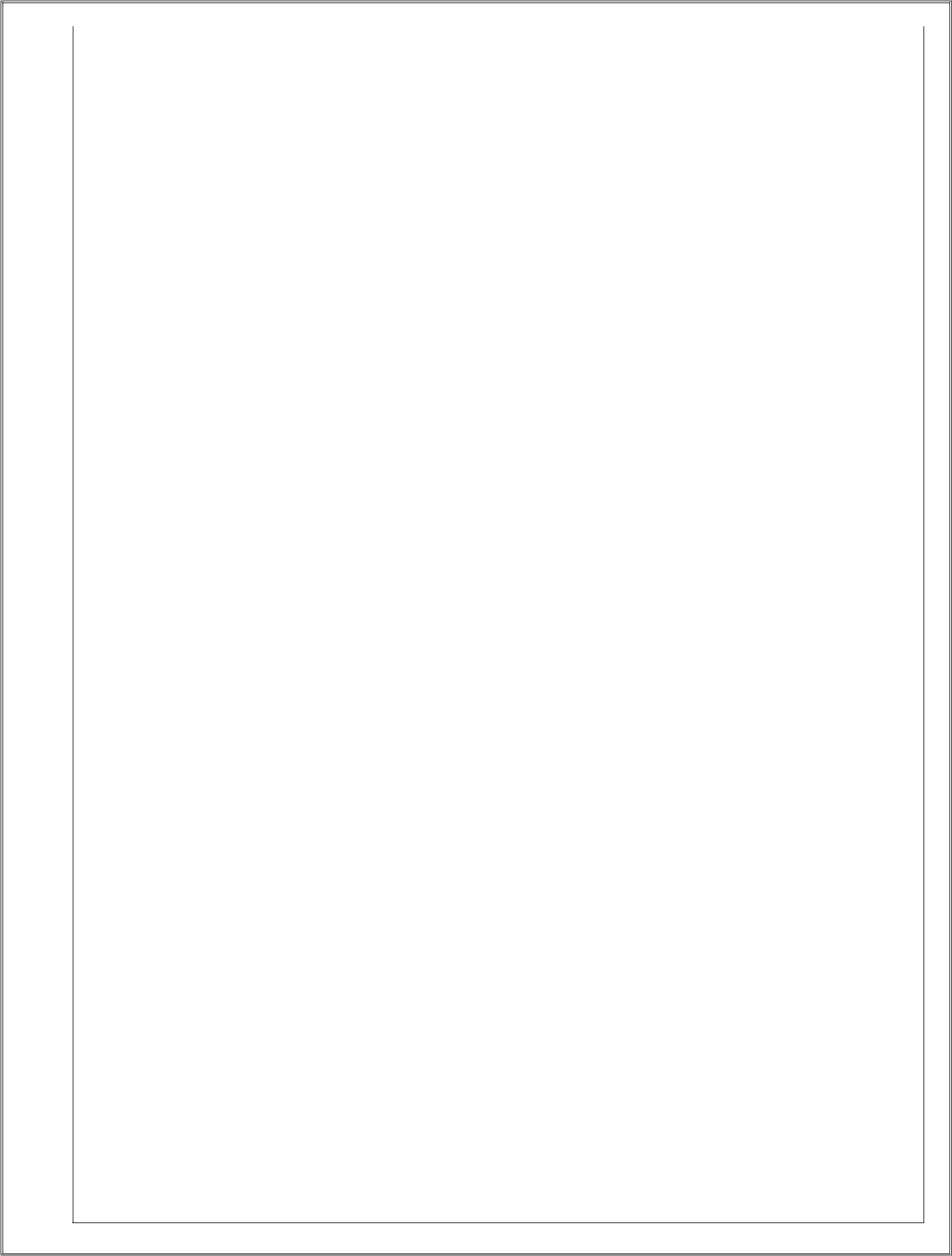
BD.

BE.

BF.

- **INPUTS** – List the production inputs for which you are requesting permanent manufacturing authority. (Please note that all inputs that are subject to AD/CVD duties must be admitted to the zone in "privileged foreign" status.)

Input Description	6-digit HTSUS	Current duty rate	Letters of associated finished product(s) above (A-E, AA-BD)
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NOTE: Because the applicant is not seeking a secondary scope for permanent manufacturing authority, Section D is not being submitted.